

EXHIBIT A

CIVIL SUIT NUMBER:

256 038 F

DIVISION " "

JACOB WILLIAMS

9TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF RAPIDES

STATE NATIONAL INSURANCE
COMPANY, ET AL

STATE OF LOUISIANA

PETITION FOR DAMAGES

The petition of JACOB WILLIAMS, a citizen, resident and domiciliary of Rapides Parish, Louisiana, who respectfully represents that:

1.

Made defendants herein are:

- A. STATE NATIONAL INSURANCE COMPANY, a foreign insurance company authorized to do and doing business in the State of Louisiana;
- B. ROBISON TIRE COMPANY, a foreign company authorized to do and doing business in the State of Louisiana;
- C. SOUTHERN TIRE MART, L.L.C., a foreign corporation authorized to do and doing business in the State of Louisiana;
- D. TIMOTHY L. HERRINGTON, a citizen, domiciliary and resident of Laurel, Jones County, Mississippi.

2.

On or about June 24, 2015, Larry J. Smith was driving a 2003 Ford Crown Victoria automobile, owned by Connie Young, in a westerly direction on Louisiana Highway 28 East in Pineville, Rapides Parish, Louisiana.

3.

On or about June 24, 2015, plaintiff, JACOB WILLIAMS was driving a 2007 Kia Spectra automobile, owned by Lawrence Tassin, also in a westerly direction directly behind the Smith vehicle on Louisiana Highway 28 East in Pineville, Rapides Parish, Louisiana.

4.

On or about June 24, 2015, Daryl Prestridge was driving his 2008 GMC Sierra truck, also in a westerly direction directly behind plaintiff, JACOB WILLIAMS' vehicle on Louisiana Highway 28 East in Pineville, Rapides Parish, Louisiana.

5.

On or about June 24, 2015, defendant, TIMOTHY L. HERRINGTON, was driving a 2014 Western Star 18-wheeler, owned by ROBISON TIRE COMPANY and/or SOUTHERN TIRE MART also in a westerly direction directly behind the Prestridge vehicle on Louisiana Highway 28 East in Pineville, Rapides Parish, Louisiana.

6.

At the time of the accident, Larry Smith's vehicle had stalled in the middle turning lane on Louisiana Highway 28 East, and plaintiff, JACOB WILLIAMS, was in the middle turn lane attempting to push the Smith vehicle out of the roadway.

7.

As Defendant, TIMOTHY L. HERRINGTON, was getting closer to these vehicles, he observed that they were stopped, however, he did not stop in time and struck Darryl Prestridge in the rear, pushing him into plaintiff, JACOB WILLIAMS' vehicle, who then struck the Smith vehicle.

8.

The aforementioned accident caused severe and disabling injuries to plaintiff, JACOB WILLIAMS.

9.

Upon information and belief, defendant, TIMOTHY L. HERRINGTON, was in the course and scope of his employment with ROBISON TIRE COMPANY and/or SOUTHERN TIRE MART.

10.

ROBISON TIRE COMPANY and/or SOUTHERN TIRE MART is responsible for the damages occasioned by its employees under the Doctrine of Respondeat Superior.

11.

As a result of the above described accident, plaintiff, JACOB WILLIAMS, sustained injuries to his neck, head, headaches, left arm, left chest wall, back, right ankle and right knee.

12.

The accident and resulting injuries and damages to plaintiff were caused by the negligence and/or fault of the defendants, ROBISON TIRE COMPANY and/or SOUTHERN TIRE MART, L.L.C. and/or TIMOTHY L. HERRINGTON, in the following particulars:

- A. Traveling at an excessive speed under the circumstances;
- B. Running into the Prestridge vehicle, causing a chain reaction with two additional vehicles;
- C. Failure to instruct employees how to properly operate and maneuver their tractor trailer;
- D. Failure to keep a proper lookout;
- E. Failure to maintain control of his vehicle;
- F. Careless operation of a vehicle;
- G. Inattentive driving;
- H. Failing to see what he should have seen;
- I. Violating the Motor Vehicle Statutes of the State of Louisiana; and
- J. Failure to take appropriate actions to avoid or mitigate the accident, when, in the exercise of due care, he should have an opportunity to do so.

13.

As a result of the above described accident, plaintiff, JACOB WILLIAMS, sustained the following damages:

- A. Pain and suffering, past and present;
- B. Loss wages;
- C. Loss of enjoyment of life;
- D. Emotional distress;
- E. Medical expenses;
- F. Interest;
- G. Costs.

14.

At the time of the accident ROBISON TIRE COMPANY and/or SOUTHERN TIRE MART, L.L.C. and/or TIMOTHY L. HERRINGTON had in full force and effect a policy of

automobile liability insurance with STATE NATIONAL INSURANCE COMPANY under the terms, conditions and provisions of which said company assumed liabilities for damages such as those sued for herein by petitioner.

WHEREFORE, PLAINTIFF PRAYS THAT:

1. The defendants be served with a copy of this Petition and duly cited to appear and answer same;
2. That after due proceedings, there be Judgment rendered herein in favor of plaintiff, JACOB WILLIAMS, and against the defendants, STATE NATIONAL INSURANCE COMPANY, ROBISON TIRE COMPANY, SOUTHERN TIRE MART, L.L.C. and TIMOTHY L. HERRINGTON, jointly and solidarily, for such damages as are reasonable in the premises, together with the maximum legal interest from date of judicial demand, until paid, and for all costs of these proceedings;
3. For full, general and equitable relief.

Respectfully submitted:

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